From: Brett.Fishwild@CH2M.com
To: Patterson, Leslie
Sent: 3/16/2017 6:33:14 PM
Subject: South Dayton Dump - PRP teleconf notes 3/16/17

Hi Leslie –

Here are the notes I took during the conference call today. Please let me know if you need anything else.

****

USEPA – Leslie Patterson
CH2M – Brett Fishwild, Dave Boehnker, Jeff Johnson
OEPA – Maddie Adams, Katie
PRPs – Ken Brown, Jim Campbell, Burner, Julian Hayward, Valerie Chen

Julian – Comment #20, East River Road properties. Concerned with SG and SW issues, windblown soils. We had in the WP an approach that we are looking at the property parcels in OU1, before doing OU2. So we can see these properties we see as a subsequent investigation. These are planned, just not until after OU1.

Leslie – we think due to their proximity these need to be looked at regardless of OU1. So move it up.

Julian – don't we want to know the COCs in the OU1 EUs first, before looking at OU2?

Leslie – why are you looking at the full suite of chemicals regardless?

Julian – there is cost implication.

Leslie – I don't have a huge problem with this, but is it specified that this is the next step?

Julian – good question. No likely specified for these parcels, a general statement (for OU2 areas).

Leslie – okay, but will let others chime in.

Maddie – can you make that general statement more detailed?

Dave – including updating the DQOs.

Julian – yes, to both.

Julian – Comment 21, OU1 parcels soil and fill. Additional analytes, chromium speciation, and other things. We have ideas, for example for chromium, we have total chromium in the PAL, we can use as an indication if need to later due speciation. Take a sample, hold at lab, decide later (within holding time). We are looking at options for all of these new analytes. Dioxan/furan is the biggest issue. They are expensive. $500-$600 a piece. We want a D/F screening method, similar to our chromium decision. We spoke with TestAmerican, they gave us some screening options. But not appropriate. Looking at other things. Another idea is to look at D/F and focus on areas of site where they are expected. Sequence or phase it to look at those areas first. This stuff is not in the WP.

Leslie – this screening, was 8280 method?

Julian – no, we need a high resolution method.

Leslie – I thought you wanted to use a low res method to screen, and then do high res?

Julian – its too low level we think. We need to look more at this.

Leslie – I can support a screening process. If too difficult, we need a balance between phasing and costs.

Julian – Comment 23. Quarry Pond. Fundamentally, where is this going ultimately?

Leslie – The QP is an area with potential HH and eco risk. So, you need to quantify those risks. As well as GW that may be loading the QP. You need an adequate number of sediment samples, spatially. Need to get away from the edges (only). We know it a challenge, but you have to get those samples to assess the QP.

Jeff – there is evidence of contamination, we need usable data to assess the risk. We've seen many challenging sites, but no worse than any other site we've sampled.

Julian – when we talk about foreign objects, they need special attention? Or just in proximity?

Jeff – no special attention. We need good coverage around the entire QP. You don't have to sample a drum, for example. Just good spatial coverage.

Julian – so make some effort to assess debris? Maybe just a camera? Practical issues.

Brett – okay for now, but Leslie, sample drums that are whole? Which MAY leak?

Leslie – yes, need to make attempt.

Boehnker – there is high res sonar options.

Julian – to get an idea WHAT things are?

Dave – yes

Maddie – we did this years ago. Some things are cars, for example.

Julian – we have a summary of that information, couple pages. Gives some indication, but nothing high res. But the higher question, what will happen with all this data. You are concerned with recreational use of the QP? Assessed in the HHRA? Need to consider the origin of the material.

Leslie – consider yes, but it is on the site. Half the QP is officially on OU1 as it is.

Julian – but some things didn't originate from site operations. Car parts from Gem City.

Ken – tires seen at the pond indicate Gem City.

Julian – there are non-site activities at play here. This impacts our investigation.

Leslie – likely true, but if you own a dump and you don't secure it, you de facto own that debris. The owner is likely still responsible.

Julian – understood. We want to consider an IC aspect, preventing access.

Ken – if we find something in there, what do we do about it? We prevent access to prevent exposure.

Jeff – that assumes the HHRA, but not eco. A fence doesn't stop eco receptors.

Julian – understood. But from a HHRA, control is a likely outcome.

Leslie – that is conservancy district land.

Julian – about 1/3 of it yes.

Dave – an IC may be going forward, but you STILL need to characterize the risk. Regardless.

Julian – understood. We will look into it. Next is Comment 24, floodplain. We say to look at low topo areas first, where stuff would accumulate. We have a topo map, aerial survey, to edge of river. There is what appears to be a low point channel like feature running parallel to bike path, along alignment of the sample locations in the WP. We proposed to look at this in the field, choose sample locations accordingly. The channel slopes to S, parallel to river, joins an existing Conservancy District storm sewer outfall. South side of QP. Outfall not directly to the river, but to a low area which eventually drains to river. On to Comment 25, requiring sediment sampling up front. We say wait until we have data closer to the site. Underlying concern too about river samples which are representative.

Jeff – understood concerns with the river, but the WP approach was not laid out in this manner. Was a simple statement that if we don't see stuff in the soils, we aren't going to the river. What you said today is much better, still need to look at GW migration as well though of course. But the phases approach seems appropriate.

Julian – good. Will update the WP text. And yes we recognize the GW pathway too. We have existing MWs we can sample. And we are planning more locations.

Leslie – to be clear, I don't think it's possible to not do ANY sampling in the river. Historical loading to the river may not be evident in today's topography.

Julian – background is critical.

Brian – to be honest, our concern is that even with this data it will be difficult to impossible to tie it to any one source due to the long use of the river corridor. Just a higher concentration downgradient than a background is not a de facto proof that the landfill caused it. It's a watershed issue.

Leslie – with any river, this happens.

Jeff – this is where it is important to collect site specific information to refine the CSM and use multiple lines of evidence. This is not impossible.

Brian – my point is that it will be impossible.

Leslie – if you cannot distinguish to some statistical degree, then there is negligible site impact. Right?

Brian – hmm, okay. We cannot debate it here.

Julian – this could turn into a huge exercise. We will explain in further detail in the WP.

Julian – the GW investigation. We see in the comments that you ID'ed areas for further work to delineate plumes. Also that you know there's impacts at some boundaries already, why not step out. We took a general approach to do OU1 first before moving out, but sure makes sense to go into OU2 now in some cases. We will add that. A couple things though – the main one is a requirement in Comment 58 for VAS samples analyzed for full list of chems. We were focused on VOCs, they are most mobile. I understand the longer list in general, but the purposes of VAS, we think only the VOCs. And it's a cost issue.

Leslie – if you are doing VAS for delineating a specific plume, then should do the COCs of that particular plume. Or think of indicator parameters. Each area is a little different. So lay this out in the WP.

Julian – okay, so will follow up with this.

Leslie – okay.

Julian – Comment 63 on EPA Method 1688 for PCBs. This poses a cost issue. Will follow up on this.

Leslie – EPA's concern is where quantitation limits exceed screening levels. Find a method or deal with the uncertainty in the RI.

Julian – we are looking into this. We need more than 30 days to revise this WP. At least 60 days, total.

Leslie – okay. will send something in writing.

Brett – does EPA require an RTC letter?

Leslie – not required.

Julian – we normally would do this. But we will streamline it, focusing on specific comments.

Brett Fishwild
Project Manager
D 1 937 220 2955
M 1 515 991 2404

CH2M
241 Taylor Street; Suite 100
Dayton, Ohio, 45402
USA
www.ch2m.com | LinkedIn Twitter | Facebook